EDMUND G. BROWN JR. Attorney General of California 2 Janice K. Lachman Supervising Deputy Attorney General 3 KENT D. HARRIS Deputy Attorney General 4 State Bar No. 144804 1300 I Street, Suite 125 5 P.O. Box 944255 Sacramento, CA 94244-2550 6 Telephone: (916) 324-7859 Facsimile: (916) 327-8643 7 Attorneys for Complainant BEFORE THE 8 BOARD OF REGISTERED NURSING DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA 10 Case No. 2011-101 11 In the Matter of the Accusation Against: 12 ACCUSATION TI ANN TAYLOR 1308 Emma Drive 13 Iowa Park, Texas 76367 14 Registered Nurse License No. 548536 15 Respondent. 16 Louise R. Bailey, M.Ed., RN ("Complainant") alleges: 17 **PARTIES** 18 Complainant brings this Accusation solely in her official capacity as the Interim 19 Executive Officer of the Board of Registered Nursing ("Board"), Department of Consumer 20 21 Affairs. On or about October 2, 1998, the Board issued Registered Nurse License Number 22 548536 to Ti Ann Taylor ("Respondent"). The license was in full force and effect at all times 23 relevant to the charges brought herein. The license expired on April 30, 2000, and has not been 24 25 renewed. -26 /// 27 /// 28 ///

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Accusation

### **JURISDICTION**

- 3. Section 2750 of the Business and Professions Code (Code) provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.
  - 4. Section 2764 of the Code provides:

"The lapsing or suspension of a license by operation of law or by order or decision of the board or a court of law, or the voluntary surrender of a of a license by a licentiate shall not deprive the board of jurisdiction to proceed with any investigation of or action or disciplinary proceeding against such license, or to render a decision suspending or revoking such license."

## STATUTORY PROVISIONS

5. Section 2761(f) of the Code states:

"Conviction of a felony or of any offense substantially related to the qualifications, functions, and duties of a registered nurse, in which event the record of the conviction shall be conclusive evidence thereof."

## **COST RECOVERY**

6. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

## FIRST CAUSE FOR DISCIPLINE

# (Conviction of a Crime)

7. Respondent is subject to discipline under Code section 2761(f), in that on or about December 9, 2009, in the case of *People v. Tiann Taylor* (Super. Ct. Fresno County, 2007, Case No. 07905642), she was convicted by the Court on her plea of guilty on three counts of violating Penal Code section 288(a) (lewd or lascivious acts upon or with the body or certain parts or members thereof of John Doe, a child under the age of fourteen years, with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual desires of the said defendant or the said

1	child), a crime that is substantially related to the qualifications, functions or duties of a registered
2	nurse.
3	<u>PRAYER</u>
4	WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
5	and that following the hearing, the Board of Registered Nursing issue a decision:
6	1. Revoking or suspending Registered Nurse License Number 548536, issued to Ti Ann
7	Taylor;
8	2. Ordering Ti Ann Taylor to pay the Board of Registered Nursing the reasonable costs
9	of the investigation and enforcement of this case, pursuant to Business and Professions Code
10	section 125.3; and,
11	3. Taking such other and further action as deemed necessary and proper.
12	DATED: Stello Strue Ben
13	LOUISE R. BAILEY, M.ED., RN Interim Executive Officer
14	Board of Registered Nursing Department of Consumer Affairs State of California
15	Complainant
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